

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WORCESTER DIVISION

DONALD P. SPEAKMAN, STEPHEN H. §
WEDEL and MARK L. ROBARE, §
Individually and On Behalf of All Others §
Similarly Situated, §
§
Plaintiffs, §
§ Civil Action No. 4:04-cv-40077-FDS
v. §
§
ALLMERICA FINANCIAL LIFE INS. & §
ANNUITY CO., FIRST ALLMERICA §
FINANCIAL LIFE INS. CO., and §
ALLMERICA FINANCIAL CORP. §
§
Defendants. §

**JOINT MOTION FOR PRELIMINARY APPROVAL OF STIPULATION OF
SETTLEMENT AND ENTRY OF HEARING ORDER**

Plaintiffs, Donald P. Speakman, Stephen H. Wedel and Mark L. Robare (Plaintiffs”), on the one hand, and Defendants Allmerica Financial Life Ins. & Annuity Co., First Allmerica Financial Life Ins. Co. and Allmerica Financial Corp., now known as The Hanover Insurance Group, Inc., (“Defendants”), on the other hand, make this Joint Motion for Preliminary Approval of Stipulation of Settlement And Entry of Hearing Order and state as follows:

1. On May 23, 2006, after extensive arm’s length negotiations, Plaintiffs and Defendants entered into a Stipulation of Settlement attached hereto as Exhibit 1 (the “Proposed Settlement”).
2. The Proposed Settlement resolves all the claims and counterclaims in this lawsuit, and provides substantial relief to the Class, as defined in the Proposed Settlement.

3. Concurrent with this Motion and as provided in the Proposed Settlement, Plaintiffs have filed an Unopposed Motion to Certify a Class for Settlement Purposes Only, and Unopposed Motion to File Second Amended Complaint.

4. As part of the Motion, Plaintiffs and Defendants seek the Court to enter approve the Order Preliminarily Certifying A Class for Settlement Purposes Only, Appointing Lead Counsel for the Class, Directing Issuance of A Class Notice to the Class, and Scheduling A Fairness Hearing that is attached as Exhibit A to the Proposed Settlement. As part of that Order, the parties seek the Court to approve the form of the Notice of Proposed Settlement (“Notice”) to be sent to the Class that is attached as Exhibit B to the Proposed Settlement, and authorize the parties to send the Notice to the proposed Class.

Wherefore, based upon the foregoing, Plaintiff and Defendant request that this Court (i) preliminarily approve the Proposed Settlement; (ii) enter the Order Preliminarily Certifying A Class for Settlement Purposes Only, Appointing Lead Counsel for the Class, Directing Issuance of A Class Notice to the Class, and Scheduling A Fairness Hearing that is attached as Exhibit A to the Proposed Settlement; and (iii) schedule the hearing to approve the Proposed Settlement, Plaintiffs’ Motion for Incentive Awards, and Lead Counsel’s Motion for Attorneys’ Fees and Expenses on August 11, 2006, at 3:00 p.m.

Dated this 21st day of June, 2006.

Respectfully submitted,

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By: /s/ Robert W. Biederman

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 21, 2006.

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